

POTOMAC ELECTRIC POWER COMPANY

1900 PENNSYLVANIA AVENUE, N.W.

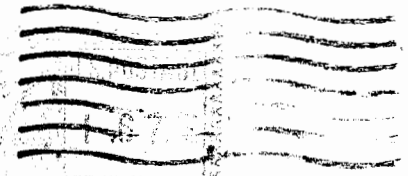
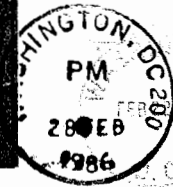
WASHINGTON, D.C. 20068

068-02486

CERTIFIED

P 344 266 465

MAIL



Ms. Joan Henry (3HW31)
Waste Management Branch
841 Chestnut Street
Philadelphia, PA 19107

3HW31



POTOMAC ELECTRIC POWER COMPANY

1900 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20068-0001

February 28, 1986

L. STEPHEN GUILAND
MANAGER, WATER & LAND USE DEPARTMENT

CERTIFIED MAIL

Mr. Angelo Tompros
Department of Environmental Services
Pesticides and Hazardous Materials Division
5010 Overlook Avenue, S. W., Rm 114
Washington, D. C. 20032

Dear Mr. Tompros:

On November 29, 1986, EPA promulgated final rules amending 40 CFR Part 266 making generators of used oil subject to notification requirements at 40 CFR Parts 262 and 266. In a letter dated January 28, 1986, we informed you of our plans to conduct an extensive evaluation of our used oil activities in order to determine which activities would require notification.

The results of our evaluation indicate that our used oil activities within the District of Columbia do not require notification. However, during our evaluation we identified a hazardous waste activity at our Buzzard Point Generating Station. Attached please find a completed notification of hazardous waste activity for the station.

If you have any questions or comments please contact Ms. Michelle Golden of my staff or me at (202) 331-6538.

Sincerely,



L. Stephen Guiland
Manager

cc: Ms. Joan Henry
EPA Region III

APR 1 1986
EPA REGION III

APR 1 1986



Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

Comments

[illegible]

P	O	T	O	M	A	C	E	L	E	C	T	R	I	C	P	O	W	E	R	C	O	M	P	A	N	Y
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Street or P.O. Box

C 3	1	9	0	0	P	E	N	N	S	Y	L	V	A	N	I	A	A	V	E	N	W								
City or Town																				State		ZIP Code							
C 4	W	A	S	H	I	N	G	T	O	N										D	C	2	0	0	6	8			

Street or Route Number

[illegible]

Name and Title (last, first, and job title)

[illegible]

A. Name of Installation's Legal Owner

[illegible]

A. Hazardous Waste Activity

☒ 1a. Generator ☐ 1b. Less than 1,000 kg/ mo.

☐ 2. Transporter

☐ 3. Treater/Storer/Disposer

☐ 4. Underground Injection

☐ 5. Market or Burn Hazardous Waste Fuel

(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

B. Used Oil Fuel Activities

☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

☐ **A. Utility Boiler**☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

ID — For Official Use Only												
C											T/A	C
W												1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

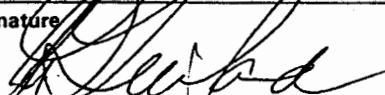
☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) L. Stephen Gulland, Manager Water & Land Use Dept.	Date Signed 2/28/86
--	--	------------------------

EPA Form 8700-12 (Rev. 11-85) Reverse

RECEIVED
WV/VA SECTION

MAR 3 1986

U.S. EPA, Region III



Notification of Hazardous Waste Activity

United States Environmental Protection Agency
Washington, DC 20460

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C
C

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)

C
F

T/A C
1

I. Name of Installation

P O T O M A C E L E C T R I C P O W E R C O M P A N Y

II. Installation Mailing Address

Street or P.O. Box

C
3

1 9 0 0 P E N N S Y L V A N I A A V E N W

City or Town

State

ZIP Code

C
4

W A S H I N G T O N

D C

2 0 0 6 8

III. Location of Installation

Street or Route Number

C
5

1 S T & V S T R E E T S S W

City or Town

State

ZIP Code

C
6

W A S H I N G T O N

D C

2 0 0 6 4

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

G O L D E N M I C H E L L E E N G

2 0 2 3 3 1 6 5 3 8

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

P E P C O

P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
☐ 2. Transporter
☐ 3. Treater/Storer/Disposer
☐ 4. Underground Injection
☐ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner
☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler

☐ B. Industrial Boiler

☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

D C D 0 0 0 8 1 9 5 0 8

ID — For Official Use Only													
C												T/A	C
W													1

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(D001)

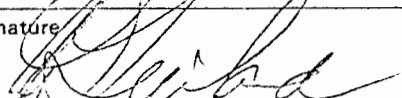
☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) L. Stephen Guiland, Manager Water & Land Use Dept.	Date Signed 2/28/86
--	--	------------------------

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS



September 27, 1984

DCO 00 081 9508

Mr. L. Stephen Guiland, Manager
Water & Land Use Department
Potomac Electric Power Company
1900 Pennsylvania Avenue, N.W.
Washington, D.C. 20068

Dear Mr. Guiland:

This is in response to your letter requesting the withdrawal of your RCRA Part A permit applications for the Benning Road and Buzzard Point facilities.

Since your company does not generate, treat or store RCRA hazardous wastes at these facilities, we accept your letter of withdrawal. We understand that you wish to retain the EPA identification number for the Benning Road facility for the purpose of removing PCB's from this facility.

Should you have any questions, please do not hesitate to call Ms. Neilima Senjalia or Mr. Byron Bacon at (202) 767-8414.

Sincerely,

A handwritten signature in cursive script, reading "Angelo C. Tompros".

Angelo C. Tompros, Chief
Pesticides & Hazardous Waste
Management Branch

cc: Mr. H. Sokolowski, EPA ✓
Mr. Wayne Naylor, EPA

Coded 32FE 9/27/84

C1105/5

C303/7

added to index

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - ~~8th~~ Chestnut St.
Philadelphia, Pa. 19107

SUBJECT: RCRA Inspection *Potomac Electric Power Company*
PePco Buzzard Point

DATE: *May 23, 1985*

FROM: *Donor* Douglas A. Donor, Environmental Scientist
RCRA Enforcement Section (3HW11)

TO: File

Thru: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

*Plant Closed for Standby Only; May be
Small Amount Generation when in operation.*


GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF ENVIRONMENTAL SERVICES

ADDRESS REPLY TO
OFFICE OF ENVIRONMENTAL
STANDARDS AND COMPLIANCE
5010 OVERLOOK AVENUE, S.W.
WASHINGTON, D.C. 20012-5397



MEMORANDUM TO: File

THRU: Angelo C. Tompros, Acting Chief
Bureau of Pesticides & Hazardous
Waste Management

FROM: Byron L. Bacon, Sanitarian  DATE: 03/19/84
Division of Hazardous Waste
Management

SUBJECT: Potomac Electric Power Company
Buzzard Point Generating Station
EPA ID #DCD 000 819 508
1st & V Streets, S.W.
Washington, D.C.

On February 8, 1984 at 11:00 a.m., a compliance inspection was completed at the Buzzard Point facility of the Potomac Electric Power Company (PEPCO). PEPCO produces electricity by burning fossil fuel. The facility inspection representative was Mr. Ronald Moore, Environmental Engineer.

The Buzzard Point facility is not currently in use: The building is kept locked. Inspection of the building confirmed that the building has not been in use for some time. Since it is not in use, there are no hazardous wastes generated.

cc: PEPCO
EPA Region III



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

DCD 00 081 9508

INSTALLATION ADDRESS

Potomac Electric Power Company
1900 Pennsylvania Avenue NW
Washington DC 20068

1st and V Streets SW
Washington, DC 20024



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

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EPA I.D. NUMBER

• DCD000819508

INSTALLATION ADDRESS

POTOMAC ELECTRIC POWER COMPANY
1900 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20068

1ST AND V STREETS SW
WASHINGTON DC 20024



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• **DCD000819508**

INSTALLATION ADDRESS

**POTOMAC ELECTRIC POWER COMPANY
1900 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20068**

**1ST AND V STREETS SW
WASHINGTON DC 20024**

Hazardous Waste Monitoring And Enforcement Log

1. EPA ID: <u>1 D 1 C 1 D 0 0 1 0 1 8 1 1 9 1 5 0 1 8 1</u> 2. FACILITY NAME: <u>PEPCO - Buzzard Point</u> 3. ADDRESS: <u>1st & V sts SW, Washington DC</u>	4. FACILITY TYPE: <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> NON-MAJOR ✓
---	--

5. TYPE OF REPORT:	<input type="checkbox"/> NEW <input checked="" type="checkbox"/> UPDATE
--------------------	---

6. DATES OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT:	START <u>02/08/84</u> H D Y
--	--------------------------------

7. TYPE OF EVALUATION COVERED BY THIS REPORT:	<input checked="" type="checkbox"/> EVALUATION INSPECTION <input type="checkbox"/> SAMPLING INSPECTION	<input type="checkbox"/> RECORD REVIEW <input type="checkbox"/> SPECIAL INSPECTION
---	---	---

8. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5):	START <u>03/22/84</u> H D Y	S
--	--------------------------------	---

9. TYPE AND CLASS OF VIOLATION (enter number of violations by type and class): None	Class of Violation	Area of Violation					
		GWM	CI/PC	Fin. Res.	Pt. B	Comp. Sched.	Other
	I						0
	II						
	III						

10. ENFORCEMENT ACTIONS for Class I Violations:											
Area of Violation	Type of Action Taken (circle one)						Date Action Taken (mdy)	Projected Compliance Date (mdy)	Actual Compliance Date (mdy)	Penalty (\$000)	
										Assessed	Collected
N/A	Informal	WL/NOV	AD	CivAc	CrimAc		___/___/___	___/___/___	___/___/___		
	Informal	WL/NOV	AD	CivAc	CrimAc		___/___/___	___/___/___	___/___/___		
	Informal	WL/NOV	AD	CivAc	CrimAc		___/___/___	___/___/___	___/___/___		
	Informal	WL/NOV	AD	CivAc	CrimAc		___/___/___	___/___/___	___/___/___		

11. COMMENTS: This facility has been closed for some time. Since it had initially submitted a Part A, its Part B was called on Jan 17, 84. Since this facility has not formally withdrawn its Part A, ~~so far~~ an inspection was conducted to complete the TSD checklist.

Statement of Permit Application

Form Submitted

By: _____

Date: ____/____/____
M D Y

1. Facility ID D C D 0 0 0 8 1 9 5 0 8

2. Facility Name PEPCO Buzzard Point Generating Station

I. For each appropriate process, fill in the Process Amount and Unit:

	Ind.	Process Amt	Unit (Circle one)
3. STORAGE			
3A. Containers	<input type="checkbox"/>	_____.	G L
3B. Tanks	<input checked="" type="checkbox"/>	<u>4000.00</u>	<u>(G)</u> L
3C. Waste Piles	<input type="checkbox"/>	_____.	Y C
3D. Surface Impoundments	<input type="checkbox"/>	_____.	G L
4. DISPOSAL			
4A. Injection Well	<input type="checkbox"/>	_____.	G L U V
4B. Landfills	<input type="checkbox"/>	_____.	A F
4C. Land Application	<input type="checkbox"/>	_____.	B Q
4D. Ocean	<input type="checkbox"/>	_____.	U V
4E. Surface Impoundments	<input type="checkbox"/>	_____.	G L
5. TREATMENT			
5A. Tanks	<input type="checkbox"/>	_____.	U V
5B. Surface Impoundments	<input type="checkbox"/>	_____.	U V
5C. Incinerators	<input checked="" type="checkbox"/>	<u>500.00</u>	D W <u>(E)</u> H
5D. Other	<input type="checkbox"/>	_____.	U V D W

II. Enter DATES for the following permit actions:

6. PART B CALL-IN:	<u>01/17/84</u> m d y		
7. PART B RECEIVED: N/A	____/____/____ m d y		
	8. APPLICATION COMPLETE: N/A	____/____/____ m d y	
9. REQUEST FOR WITHDRAWAL: N/A	____/____/____ m d y	Status code: _____	
10. APPLICATION WITHDRAWN: N/A	____/____/____ m d y	Status code: _____	
	11. NOTICE OF DRAFT PERMIT: N/A	____/____/____ m d y	Status code: _____
	12. INTENT TO DENY: N/A	____/____/____ m d y	Status code: _____
13. PERMIT ISSUED: N/A	____/____/____ m d y	Status code: _____	
14. PERMIT DENIED: N/A	____/____/____ m d y	Status code: _____	
	15. EXPIRATION DATE: N/A	____/____/____ m d y	
16. PERMIT TERMINATED: N/A	____/____/____ m d y		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection *PEPCO - Bayard Point*
DCD000819508

DATE: *5/2/84*

FROM: Vickie Province, Environmental Engineer
RCRA Enforcement Section (3HW11)

TO: File

Thru: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF ENVIRONMENTAL SERVICES

ADDRESS REPLY TO
OFFICE OF ENVIRONMENTAL
STANDARDS AND COMPLIANCE
5010 OVERLOOK AVENUE, S.W.
WASHINGTON, D.C. 20032-5397



MEMORANDUM TO: File

THRU: Angelo Tompros, Acting Chief
Bureau of Pesticides & Hazardous Waste
Management

FROM: Byron Bacon, Sanitarian
Division of Hazardous Waste
Management

DATE: March 22, 1984

SUBJECT: Potomac Electric Power Company (PEPCO)
Buzzard Point Generating Station
EPA ID #DCD 000 819 508
1st & V Streets, S.W.
Washington, D.C.

On March 22, 1984, a TSD checklist was completed for the Buzzard Point Generating Station. The facility inspection representative was Mr. Ronald Moore, Environmental Engineer. PEPCO notified in 1980 that this facility stored in tanks and incinerated hazardous waste.

The Buzzard Point facility has been closed for some time and PEPCO (according to Mr. Moore) intends to withdraw Part A of its permit application.

cc: PEPCO
EPA Region III

Coded 10/4/84
32 FE 9/27/84
Coded
C105/5
C303/7
deleted 5/1/85

RCRA CHECKLIST FOR INSPECTION OF TSD FACILITIES

RO USE

Name of Facility: PEPCO - Buzzard Point
 Address: 1st & V Streets SW
Wash. DC. 20003
 EPA TSD ID Number: DCLD 000 819 508
 Facility Inspection Representative: Mr. Ronald Moore
 Title: Environmental Engineer
 Telephone: (202) 331-6537

Inspection File

No. _____

Reviewer _____

Date reviewed _____

Form "B"

SITE CHARACTERIZATION (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

TREATER

STORER

DISPOSER

☐ Filtration
☐ Incineration
☐ Thermal Reduction
☐ Recycling/Recovery
☐ Chem/Phys/Bio Treatments
☐ Waste Oil
☐ Reprocessing
☐ Solvent Recovery
☐ Other _____

☐ Open Pile
☐ Surface Impoundment
☐ Drum
☐ Above ground tank(s)
☐ Below ground tank(s)
☐ Other _____

☐ Landfill operation
☐ Land treatment
☐ Surface Impoundment
☐ Incineration
☐ Other _____

*This facility has been
closed for some time.*

INSPECTION PROCEDURE

1. Does the facility generate hazardous wastes?

Yes

No ☒

Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed off-site.

- 265.13(b) 2. Does the facility have in place a waste analysis plan?

Yes

No

If so,

- 265.13(a) A. Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?

Yes

No

- 265.13(c) B. Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?

Yes

No

3. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? Yes No

	A.	If not, does the facility have an artificial or natural boundary which surrounds active portions of the facility and,	Yes	No
	B.	A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.?	Yes	No
65.14 (c)	4.	*Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (An example would be: "Danger - Unauthorized Personnel Keep Out!")	Yes	No
		If so,		
	A.	Is the sign legible from a distance of 25 feet?	Yes	No
	B.	Is the sign in English or any other foreign language predominant to the geographical area?	Yes	No
65.15(d) 65.15(b)	5.	Does the TSD facility have an inspection log and a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies?	Yes	No
65.16(a)	6.	Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	Yes	No
65.16(d)	7.	Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	Yes	No
65.16(d)(2)	8.	Does the TSD facility have on record a written position description for each job title noted in Question #6?	Yes	No
65.16(d)(3)	9.	Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #6?	Yes	No
65.32(a)	10.	*Does the TSD facility have installed the following equipment:		
	A.	An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?	Yes	No
	B.	A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?	Yes	No
	C.	Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals?	Yes	No
65.35	11.	*Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?	Yes	No

265.50	12. Does the facility have a contingency plan which contains the following elements:		
265.52(c)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?	Yes	No
265.52(d)	B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations?	Yes	No
265.52(d)	C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? <u>Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.</u>	Yes	No
265.52(e)	D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility?	Yes	No
265.52(f)	E. *An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility?	Yes	No
265.55	13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures?	Yes	No
	If so, please complete below:		
	Name: <u>Mike Reilly</u>		
	Title: <u>Supt. of Auto Combustion Turbines</u>		
	Telephone Number: <u>872-2000</u>		
265.73	14. Does the TSD facility have a written operating record which contains the following information:		
265.73(b)(1)	A. A description and the quantity of each hazardous waste received and the method and date of treatment, storage or disposal?	Yes	No
265.73(b)(2)	B. The location of each hazardous waste within the facility and the quantity at each location?	Yes	No
265.73(b)(3)	C. Detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?	Yes	No
265.73(b)(4)	D. Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?	Yes	No
265.73(b)(5)	E. Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?	Yes	No

265.73(b) (6)	F. Detailed monitoring, testing, and analytical data to insure compliance with the regulations?	Yes	No
	15. Have the TSD facility operators initiated the preparation of written closure and post closure plans in order to meet the May 1981 target date for implementation of these requirements?	Yes	No
265.71	16. Does the TSD facility receive hazardous waste from off-site generators?	Yes	No
	If yes, are the following procedures implemented:		
	A. Manifest copies are signed and dated	Yes	No
	B. A copy is given to the transporter	Yes	No
	C. A copy is sent to the generator	Yes	No
	D. A copy is returned and filed at the TSD facility	Yes	No
	Note: These requirements do not pertain to onsite facilities unless such facilities also receive hazardous wastes from off-site sources.		
265.90	17. Has the owner or operator implemented a groundwater monitoring program if surface impoundments, landfills or land treatment technologies are utilized at the facility?	Yes	No
	Note: Plan not required until one year after effective date of regulations.		
	18. The inspector should check for the following conditions at the TSD facility:		
	A. Open fires	Yes	No
	B. Fumes or gases	Yes	No
	C. Leaks or corrosion in containers or other storage structures	Yes	No
	D. Leachate to receiving streams	Yes	No
	E. Malfunction of equipment	Yes	No
	F. Bulging drums	Yes	No
	G. Excessive heat generation from storage facilities, lagoons, storage piles, etc.	Yes	No

Inspector's Name: Neelima Senjalia
Title: Sanitarian
Agency: DCRA / DIV. of Hig Waste
Office location: 5010 Overlook Ave SW
Date of Inspection: Wash. DC. 20032
March 22, 84
Inspector's Name: Mr. Byron Bacon
Title: _____
Agency: _____
Office location: _____
Date of Inspection: March 22, 1984.

POTOMAC ELECTRIC POWER COMPANY
WATER AND LAND USE DEPARTMENT

1900 PENNSYLVANIA AVENUE, N.W., WASHINGTON, D.C. 20068
(202) 872-2000

call 1105/4

April 4, 1984

Mr. Angelos Tompros, Chief
Division of Pesticides and Hazardous
Waste
D.C. Department of Environmental
Services
5010 Overlook Avenue, S.W.
Washington, D.C. 20032

RECEIVED
Facilities Management Section

APR 10 1984

U.S. EPA, Region III

Dear Mr. Tompros:

The purpose of this letter is to inform you that the Potomac Electric Power Company (PEPCO) wishes to withdraw its RCRA Part A permit application for the Benning and Buzzard Point Generating Station(s) submitted to the Environmental Protection Agency (EPA) on November 19, 1980. The applications were submitted in response to Section 270.70(a) of the EPA RCRA regulation of May 19, 1980 and to protect our right to obtain a RCRA permit for our facilities, if required.

As you know, the EPA's May 19, 1980 regulations were very complex and unclear in a number of areas related to the types of activities or waste(s) streams that were required to obtain RCRA permits. Many companies, like ourself, elected to comply with the notification requirement and submit Part A applications for obtaining interim status permits until the much needed clarification was obtained from EPA. We have, since then, received this clarification from the Agency and have determined that we do not generate, treat, or store hazardous waste at these facilities. Therefore, PEPCO's filing of the 1983 annual hazardous waste report for its Benning and Buzzard Point Generating Stations is in the form of negative reports.

Further, please be aware that PEPCO has determined that compliance with the financial test of the RCRA rules (40 CFR § 265.147) to demonstrate liability coverage and assurance of closure care is no longer required for the PCB containment building at its Benning Road Generating Station and the temporary storage location for PCBs at its Buzzard Point Station. In 1981, PEPCO demonstrated compliance with the financial test in anticipation that PCBs would be regulated under the RCRA rules in the future. However, under the recently issued D.C. HWM regulations, PCB is not a listed waste and hence, PEPCO is not required to submit to DES updated financial information for the financial test as required by 40 CFR §

Mr. Angelos Tompros
April 4, 1984
Page Two

265.147(f)(5). PCBs are still regulated under the EPA PCB regulations, 40 CFR Part 761. PEPCO's PCB activity at these facilities is in full compliance with these rules.

Should you have any questions on the above, please do not hesitate to contact Tyrone Williams or me at (202) 331-6539.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Stephen Guiland", written in a cursive style.

L. Stephen Guiland
Manager

TAW:jmm

cc: Mr. Thomas Eichler (3RA003)
Mr. Anthony Donatoni (3HW31)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - PEPCO, Buzzard Point Station
DCD 00 081 9516 *500*

DATE: **APR 4** 1983

FROM: Douglas A. Donor, Environmental Scientist *DP*
Waste Enforcement Section (3AW22)

TO: File

THRU: Walter Lee *✓*
Chief, Waste Enforcement Section (3AW22)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE
FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FUTHER
ACTION IS REQUIRED AT THIS TIME.

Memorandum



Government of the District of Columbia

TO: Angelo Tompros, Chief
Pesticides & Hazardous Waste
Management

Department, Environmental Services
Agency, Office: Pesticides & Hazardous
Waste Management

FROM: N. Senjalia, Consumer Safety Officer
B. Bacon, Sanitarian

Date: February 10, 1983

SUBJECT: RCRA Inspection at PEPCO, Buzzard Point

On January 27, 1983, N. Senjalia and B. Bacon met with Mr. Bill Moore at the PEPCO Buzzard Point Generating Station.

This plant has been closed for more than a year. In the past, this facility had been used to produce electricity by burning fossil fuel. It is now securely locked and there is a guard on duty twenty-four hours a day. Mr. Moore stated that PEPCO is required to keep this as a standby facility for emergencies. PEPCO therefore wishes to retain their EPA identification number.

RECEIVED

MAR 1 1983 DY

RCRA Compliance Section
EPA Region III

Please print or type with ELITE type (12 characters per inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

<div style="display: flex; justify-content: space-between; align-items: center;"> <div> U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT </div> </div> <div style="border: 1px solid black; height: 100px; margin-top: 10px; display: flex; align-items: center; justify-content: center;"> PLEASE PLACE LABEL IN THIS SPACE </div>	<div style="border: 1px solid black; padding: 2px;"> I. TYPE OF HAZARDOUS WASTE REPORT TYPE A: GENERATOR - OFF-SITE SHIPMENTS ONLY </div> <div style="border: 1px solid black; padding: 2px; margin-top: 2px;"> THIS REPORT IS FOR THE YEAR ENDING DEC. 31, 1983 </div> <div style="border: 1px solid black; padding: 2px; margin-top: 2px;"> TYPE B: RESERVED </div> <div style="border: 1px solid black; padding: 2px; margin-top: 2px;"> TYPE C: RESERVED </div>
---	--

INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above-left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).

II. INSTALLATION'S EPA I.D. NUMBER
 FDCD00008195081

III. NAME OF INSTALLATION
 BUZZARD POINT GENERATING STATION

IV. INSTALLATION MAILING ADDRESS
 STREET OR P.O. BOX
 31900 PENNSYLVANIA AVE NW
 CITY OR TOWN ST. ZIP CODE
 WASHINGTON DC 20068

V. LOCATION OF INSTALLATION
 STREET OR ROUTE NUMBER
 5 FIRST & V STREETS SW
 CITY OR TOWN ST. ZIP CODE
 WASHINGTON DC 20024

VI. INSTALLATION CONTACT
 NAME (last and first) PHONE NO. (area code & no.)
 GRANT KEVIN 202-331-6640

VII. TRANSPORTATION SERVICES USED (for Type A reports only)
 List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

 N/A

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L. Stephen Guiland
A. PRINT OR TYPE NAME

B. SIGNATURE

4/4/84
C. DATE SIGNED

Please print or type with ELITE type (12 characters per inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT (continued) <i>(Collected under the authority of Section 3002 of RCRA.)</i>												
FOR OFFICIAL USE ONLY <i>(Items 1 and 2)</i>	1. DATE RECEIVED							IX. GENERATOR'S EPA I.D. NUMBER						
	2. TYPE OF REPORT							G						
		XI. FACILITY NAME (specify)						XII. FACILITY ADDRESS (specify street or P.O. box no., city, state, & zip code)						
		X. FACILITY'S EPA I.D. NUMBER												
XIII. WASTE IDENTIFICATION														
A. WASTE DESCRIPTION														
LINE NUMBER	1. GENERATOR'S DESCRIPTION OF WASTE	2. DOT HA- ZARD CLASS	3. EPA HAZARDOUS WASTE NUMBER <i>(see instructions)</i>	B. AMOUNT OF WASTE	C. UNIT OF MEASURE <i>(enter code)</i>									
1	No hazardous waste in 1983													
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
XIV. COMMENTS (enter information by line number — see instructions)														

D C D 0 0 0 8 1 9 5 0 8

1. FACILITY NAME: Potomac Electric Power Company - Buzzard Point Generating Station

3. ADDRESS: 1st & V Streets, S.W., Washington, DC

4. FACILITY TYPE:

☒ MAJOR

☒ NON-MAJOR

5. TYPE OF REPORT:

☒ NEW ☐ UPDATE

6. DATES OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT:

START 02/08/84
H D Y

7. TYPE OF EVALUATION COVERED BY THIS REPORT:

☒ EVALUATION INSPECTION
☐ SAMPLING INSPECTION

☐ RECORD REVIEW

☐ SPECIAL INSPECTION

8. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5):

START / /
H D Y

9. TYPE AND CLASS OF VIOLATION (enter number of violations by type and class):

Class of Violation

Area of Violation

GWM

CI/PC

Fin. Res.

Pt. B

Comp. Sched.

Other

I

II

III

RECOMMENDED ACTIONS for Class I violations:

Type of Action Taken (circle one)

Date Action Taken (mdy)

Projected Compliance Date (mdy)

Actual Compliance Date (mdy)

Penalty (\$1000)

Assessed

Collected

Informal WL/AC AD CivAc CrimAc

Informal WL/AC AD CivAc CrimAc

Informal WL/AC AD CivAc CrimAc

Informal WL/NOV AD CivAc CrimAc

COMMENTS: This facility is not in use, thus, no wastes are being generated.



Dispatch
FW
0003

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF ENVIRONMENTAL SERVICES

OFFICE OF THE DIRECTOR

JAN 17 1984

CERTIFIED MAIL NO: 954202
RETURN RECEIPT REQUESTED

Mr. William A. Foy, Director
Environmental Affairs
PEPCO - Buzzard Point Generating Station
1900 Pennsylvania Avenue, N.W.
Washington, D.C. 20068

RE: EPA ID Number DCD 00 031 9508

Facility Name: PEPCO - Buzzard Point
Generating Station

Dear Mr. Foy:

This letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Hazardous Waste Management Act, D.C. Law 2-64 for the facility referenced above. This request is made under the authority of D.C. Hazardous Waste Management regulation Part 270. Even though you have received a request from EPA to submit the Part B application, the District will process the permit application.

On November 22, 1983, the District received interim authorization from EPA to conduct its hazardous waste management program in lieu of the federal program. This grants the District the authority to issue permits to hazardous waste management facilities.

Under the D.C. Hazardous Waste Management Regulations, an existing interim status facility that has been requested to submit a Part B is allowed at least six months to submit the required data to the District. The District then has 60 days from the date of receipt of a Part B submittal in which to notify the facility whether or not the application is complete. If it is not complete, the District issues a Notice of Deficiency advising the facility as to what must be submitted for the application to be determined complete. The facility then has 30 days in which to submit the required information; otherwise, it may be subject to an enforcement action and possible loss of interim status.

Enclosed for your reference is a list of the items which constitute Part B as applicable to your facility type. These items must be submitted by July 13, 1984. Please submit four copies of your Part B application. If any of this information is

Mr. William A. Foy

Page 2

being submitted under a claim of confidentiality, please indicate this fact. Claims for confidentiality must be supported by answering the following questions:

1. Which portions of the information do you claim are entitled to confidential treatment?
2. How long do you want this information treated confidentially?
3. What measures have you taken to guard against undesired disclosure of the information to others?
4. To what extent has the information been disclosed to others, and what precautions have you taken in connection with that disclosure?
5. Has EPA or any other Federal or District of Columbia Agency made a pertinent confidentiality determination? (If so, include a copy of this determination or reference to it, if available).
6. Will disclosure of the information be likely to substantially harm your competitive position? If so, what would the harm be, and why should it be viewed as substantial? What is the relationship between disclosure and the harm?

Please submit all necessary materials to:

D.C. Department of Environmental Services
Bureau of Pesticides and Hazardous Waste Management
5010 Overlook Avenue, S.W., Room 115
Washington, D.C. 20032-5397

Should you have any questions about these requirements, please contact Mr. Angelo Tompros at (202)767-8422.

Sincerely yours,

William B. Johnson
Director

Enclosure: D.C. Hazardous Waste Management
Regulations

DES:OES&QA:JMcDermott:ATompros:ra:01/09/84

NOV 10 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. William A. Foy
Director, Environmental Affairs
PEPCO-Buzzard Point Generating Station
1900 Pennsylvania Avenue, N.W.
Washington, D. C. 20068Re: EPA Identification Number: DCD 00 081 9508
Facility Name: PEPCO - ~~Benning Road~~ Buzzard Point Generating Station
Buzzard Point

Dear Mr. Foy:

This letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. This request is made under the authority of regulation 40 CFR §270.

Under Federal requirements, an existing interim status facility that has been requested by EPA to submit a Part B is allowed at least six months to submit the required data to EPA. EPA then has 60 days from the date of receipt of a Part B submittal in which to notify the facility whether or not the application is complete. If it is not complete, EPA issues a Notice of Deficiency advising the facility as to what must be submitted for the application to be determined complete. The facility then has 30 days in which to submit the required information; otherwise, it may be subject to an enforcement action and possible loss of interim status.

Enclosed for your reference is a list of the items which constitute Part B as applicable to your facility type. These items must be submitted by May 14, 1984. Please submit four copies of your Part B application. If any of this information is being submitted under a claim of confidentiality, please indicate this fact. Claims for confidentiality must be supported under the requirements of 40 CFR Part 2.

*Sent certified P257711020 with
PEPCO EPC 000819516*

Blaszczak:jcc:10-3-83

CONCURRENCES

SYMBOL	SURNAME	DATE	CONCURRENCES
11/3/83	Corbett	11/3/83	3AW33
11/7/83	Bulkin	11/7/83	Anderson
	Blaszczak		Allen

Should you have any questions about these requirements, please contact Robert Blaszcak at (215) 597-8116 or at the address shown above.

Sincerely yours,

Stephen R. Wassersug, Director
Air and Waste Management Division

Enclosures: List of Part B Requirements
Deconsolidated Permit Regulations
Guidance Manual

cc: Mr. Angelo Tompros

FORM 1 GENERAL		EPA GENERAL INFORMATION Consolidated Permit Program (Read the "General Instructions" before starting.)		EPA I.D. NUMBER EDCD0000819500	
SECTION I I. EPA I.D. NUMBER II. FACILITY NAME III. FACILITY ADDRESS IV. FACILITY MAILING ADDRESS V. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE No. 1900001059		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it to the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (be sure to fill in the left of the label space) enter the information that should appear, unless provided it is the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI except VI-B which must be completed regardless. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

III. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of solid-based terms.

SPECIFIC QUESTIONS	MARK X			SPECIFIC QUESTIONS	MARK X		
	YES	NO	ATTACHED		YES	NO	ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (either existing or proposed) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY
 1. NAME: **PEPCO Buzzard Point Generating Station**

IV. FACILITY CONTACT

A. NAME & TITLE (Last, first, & title)		B. PHONE (area code & no.)	
2. NAME	HUNTER JAMES H ENVIRONMENTAL ENG	202	331 6536

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
1900 PENNSYLVANIA AVE NW		WASHINGTON DC			20068

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE
1ST & V STREETS, SW				WASHINGTON DC		20068	

CONTINUED FROM THE FRONT

SIC CODES (4-digit, in order of priority)	
A. FIRST 4 9 1 1 (specify) Steam Electric Power Generation	B. SECOND (specify)
C. THIRD (specify)	D. FOURTH (specify)

III. OPERATOR INFORMATION

POTOMAC ELECTRIC POWER COMPANY	
C. STATUS OF OPERATOR (check one)	
F - FEDERAL S - STATE P - PRIVATE	M - PUBLIC (other than federal or state) O - OTHER (specify) P (specify)
D. PHONE (area code - number)	
202 331 6536	
E. STREET (no P.O. box)	
1900 PENNSYLVANIA AVE NW	
F. CITY OR TOWN	G. STATE
WASHINGTON DC	DC
H. ZIP CODE	I. INDUSTRY
20068	INDIANLAND

EXISTING ENVIRONMENTAL PERMIT

A. NPDES (Discharges to Surface Water)	B. PDES (Discharges to Surface Water)
DC 0000108	
C. LUC (Underground Discharge of Fluids)	D. LUC (Underground Discharge of Fluids)
	(specify)
E. RCRA (Hazardous Wastes)	F. RCRA (Hazardous Wastes)
	(specify)

MAP

Attach to this application a topographic map of the area in which the facility is located, showing the property boundaries, the outline of the facility, the location of each of its buildings, structures, pipes, conduits, tanks, waste treatment, storage, or disposal facilities, and each well, water body, or other feature located in the map area. See instructions for details.

IV. NATURE OF BUSINESS (provide a brief description)

The Buzzard Point Generating Station is one of six (6) PEPCO owned and operated electric power plants serving the Washington Metropolitan area. The facility generates steam by burning fossil fuel to produce electricity. Presently, there are six (6) units that are capable of generating 305 MW of power.

V. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined the information submitted in this application, and that, based on my knowledge of the facts and circumstances, the information is true, accurate, and complete. I believe that the information is true, accurate, and complete, and that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
William A. Foy Director, Environmental Affairs	<i>William A. Foy</i>	11/19/80

COMMENTS FOR OFFICIAL USE ONLY

--

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. JZ	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W	D	C	D	0	0	0	8	1	9	5	0	8	T/A	C	W	DUP				T/A	C	DUP			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	1	2	3	4	5	6	7	8	9	10	
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE		C. UNIT OF MEASURE (enter code)		D. PROCESSES																		
	23	24	25	26	27	28	1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
1	F	0	0	1	4,200	P	S	0	2	T	0	3													
2	U	2	1	0	330	P	S	0	2	T	0	3													
3	D	0	0	2	13,000	T	S	0	2	T	0	1	- EXCLUDED AS PER 11/19/80 LETTER.												
4													WW												
5																									
6																									
7																									
8																									
9																									
10																									
11																									
12																									
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21																									
22																									
23																									
24																									
25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)***E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	D	C	D	0	0	0	8	1	9	5	0	8	6	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	8	5	1	0	4	7
55	56	57	58	59	60	71

0	7	7	0	0	0	4
72	73	74	75	76	77	78

VIII. FACILITY OWNER

☒ If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
E														

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F														


IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

William A. Foy, Director
Environmental Affairs

B. SIGNATURE



C. DATE SIGNED

11/19/80

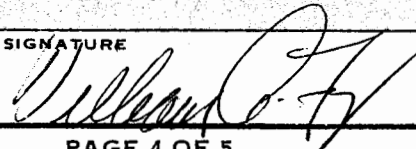
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

William A. Foy, Director
Environmental Affairs

B. SIGNATURE



C. DATE SIGNED

11/19/80



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND MARLINTON STREETS
PHILADELPHIA, PENNSYLVANIA 19106

Aug 8, 1983

In Reply Refer To: 3AW22

Certified Mail
Return Receipt Requested

Mr. L. Stephan Guiland
Manager, Water and Land Use Department
Potomac Electric Power Company
1900 Pennsylvania Avenue, N.W.
Washington, D.C. 20068

Re: NOTICE OF VIOLATION NO. III-83-26-VR
PEPCO
Benning Road, DC
EPA I.D. No. DCD 000819516
Buzzard Point, DC
EPA I.D. No. DCD 000819508

Dear Mr. Guiland:

On April 16, 1982 the Environmental Protection Agency (EPA) published in the Federal Register regulations under the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901-6987 (the Act), concerning assurance of liability coverage which must be obtained by owners or operators of some hazardous waste management facilities. These regulations required all hazardous waste treatment, storage and disposal facilities subject to the federal program to submit documents concerning liability coverage to EPA by July 15, 1982. These regulations are codified in Title 40, Code of Federal Regulations Part 265 Subpart H.

Our records indicate that Liability Requirements for this facility were demonstrated by use of a financial test as specified in 40 C.F.R. § 265.147(f). This facility initially submitted three items to the Regional Administrator as required by 40 C.F.R. § 265.147(f)(3). The items are; a letter from the Chief Financial Officer, a year end CPA report and/or the annual report, and a special report from the CPA. The reports are described in § 265.147(f)(3)(i)(ii) and (iii) respectively.

In accordance with 40 C.F.R. § 265.147(f)(5) these reports must be updated and sent to the Regional Administrator within 90 days after the close of the fiscal year. Our records indicate this facility uses the calendar year as the fiscal year. Therefore, these reports were due in the EPA Region III office as of March 31, 1983. As of the date of this notice, EPA has not received the documents required by regulation 40 C.F.R. § 265.147 for the above facility. PEPCO is, then, in violation of the regulations and the Act.

PEPCO must achieve compliance with these regulations as quickly as possible. If compliance is not achieved within 10 days of receipt of this notice, EPA may take administrative or civil action against PEPCO to require compliance. The Act authorizes penalties of up to \$25,000 per day for each violation.

If you have any questions concerning this notice, please contact Douglas A. Donor, of my staff at the above address or at (215) 597-8541.

Sincerely yours,

Stanley L. Laskowski
Deputy Regional Administrator

POTOMAC ELECTRIC POWER COMPANY

WATER AND LAND USE DEPARTMENT

• 1900 PENNSYLVANIA AVENUE, N.W., WASHINGTON, D.C. 20068

(202) 872-2000

December 20, 1982

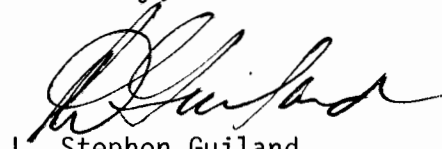
Ms. Carole Dougherty
Waste Management Branch (3AW32)
EPA Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Dear Ms. Dougherty:

Attached please find 2 completed 1981 status sheets for non-regulated facilities for the Potomac Electric Power Company's (PEPCO) Benning Generating Station (EPA I.D. #DCD000819516) and Buzzard Point Generating Station (EPA I.D. #DCD000819508). As explained in S-IV, the high efficiency electric utility boilers are exempt from Subtitle C regulations, due to an interpretation provided by EPA to the utility industry in a January 13, 1981 letter.

If you have any questions pertaining to this matter, please do not hesitate to contact either myself or Gail Lee at (202) 331-6536.

Sincerely,



L. Stephen Guiland
Manager

AGL:jmm

Attachment

RECEIVED
BCRA PERMITS & COMPLIANCE

DEC 27 1982

EPA, R3

1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

DCD000819508

03

GF

PEPCO BUZZARD POINT GENERATING STATION
ATTN: HUNTER JAMES M. ENV. ENG.
1900 PENNSYLVANIA AVE NW
WASHINGTON DC 20068

RECEIVED
RCRA PERMITS & PESTICIDES SECT

S-I. FACILITY EPA I.D. NUMBER

T/A C
F 1 2 13 14 15

DEC 27 1982

EPA, R3

S-II. NAME OF FACILITY

30 69

S-III. FACILITY MAILING ADDRESS

3 15 16 45

Street or P.O. Box

4 15 16 41 42 47 51

City or Town

State Zip Code

S-IV. 1981 STATUS (please explain your 1981 non-regulated status here)

All hazardous waste generated and treated at Buzzard Point Generating Station are exempted from RCRA Subtitle C regulations. This interpretation was provided by EPA to the Utility Solid Waste Action Group in a January 13, 1981 letter which stated that wastes that "traditionally have been, and which actually are, mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag, and flue gas emission control wastes" are not considered hazardous wastes.

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not treat, store, or dispose of hazardous waste during 1981 and that to the best of my knowledge this facility is not subject to the RCRA Annual Reporting requirement.

L. Stephen Guiland, Mgr., Water & Land Use

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

L. Stephen Guiland 12/20/82

1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

DCD000819516

03

GF

PEPCO BENNING ROAD GENERATING STATION
ATTN: HUNTER JAMES M. ENV. ENG.
1900 PENNSYLVANIA AVE NW
WASHINGTON

DC 20068

RECEIVED
RCRA PERMITS & PESTICIDES SECT

S-I. FACILITY EPA I.D. NUMBER

T/A C
F 1
1 2 13 14 15

DEC 27 1982

EPA, R3

S-II. NAME OF FACILITY

30 69

S-III. FACILITY MAILING ADDRESS

3
15 16 45

Street or P.O. Box

4
15 16 41 42 47 51

City or Town

State Zip Code

S-IV. 1981 STATUS (please explain your 1981 non-regulated status here)

All hazardous waste generated and treated at Benning Generating Station are exempted from RCRA Subtitle C regulations. This interpretation was provided by EPA to the Utility Solid Waste Action Group in a January 13, 1981 letter which stated that wastes that "traditionally have been, and which actually are, mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag, and flue gas emission control wastes" are not considered hazardous wastes.

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I certify under penalty of law that the installation identified above did not treat, store, or dispose of hazardous waste during 1981 and that to the best of my knowledge this facility is not subject to the RCRA Annual Reporting requirement.

L. Stephen Guiland, Mgr. Water & Land Use

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

L. Stephen Guiland 12/20/82



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUN 1 1982

DCD 00 081 9508

Mr. William A. Foy
PEPCO - Buzzard Point Generating Station
1900 Pennsylvania Avenue N.W.
Washington, DC 20068

Dear Mr. Foy:

This letter is to make you aware of two recent amendments to the RCRA regulations. On April 7, 1982, the Environmental Protection Agency (EPA) published requirements for owners and operators of hazardous waste management facilities to demonstrate financial responsibility for the costs of closure and post-closure care. EPA published third party liability coverage requirements for owners or operators of hazardous waste management facilities on April 16, 1982.

Closure and Post-Closure Assurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you are required to submit information that demonstrates that you are financially capable of bearing the costs of closing your facility. In addition, if you own or operate a disposal facility, you also must submit information that demonstrates that you are capable of covering the costs of post-closure care of your facility.

The appropriate documentation, as specified in the enclosed regulations, must be submitted to this EPA Regional Office by July 6, 1982. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- ° a trust agreement;
- ° a surety bond;
- ° a letter of credit, including a trust agreement;
- ° a certificate of insurance;
- ° a letter from your firm's chief financial officer;
and a special report and a report of examination from an
independent certified public accountant; or
- ° a corporate guarantee.

Liability Insurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you must demonstrate that you have liability insurance for sudden accidental occurrences at your facility. In addition, if you own or operate a landfill, surface impoundment, or land treatment facility, you must also demonstrate that you have liability insurance for nonsudden accidental occurrences at your facility.

You may use either an insurance policy or a financial test to demonstrate third party liability coverage. You must submit to this office by July 15, 1982, the appropriate documentation for liability coverage for sudden accidents, as specified in the enclosed regulations. You must submit the appropriate documentation for liability coverage for nonsudden accidents, as specified in the enclosed regulations, according to the following phase-in schedule: by January 16, 1983, if you have annual sales or revenues of \$10 million or more; by January 16, 1984, if you have sales or revenues between \$5 and \$10 million; or by January 16, 1985 if your annual sales or revenues are less than \$5 million. If you fall into one of the last two groups, you must submit notification of when you will have liability coverage for nonsudden accidents by January 16, 1983. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- ° a certificate of insurance;
- ° a liability endorsement; or
- ° a letter from your firm's chief financial officer, and a special report and a report of examination from an independent certified public accountant.

The financial documents must be sent to:

Ms. Shirley Bulkin (3AW32)
U. S. Environmental Protection Agency
Region III, Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Please be sure to include your EPA Identification Number on all correspondence.

Only generators who store hazardous waste on site in tanks or containers for less than 90 days are exempt from these requirements. Also, State and Federal facilities are exempt from these requirements. Your State, however, may have additional requirements in these areas.

Please review the enclosed copies of the revised interim final regulations and minor corrections. Failure to comply with these requirements subjects you to possible enforcement action. If you have any questions or need assistance, please feel free to contact Mr. William Schremp of the State Waste Management Section at (215) 597-0982.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Robert M. Waters".

Stephen R. Wassersug, Director
for Air and Waste Management Division

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUL 13 1981

Mr. William A. Foy
PEPCO - Buzzard Point Generating Station
1900 Pennsylvania Avenue NW
Washington, D. C. 20068

Dear Mr. Foy:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin
Shirley D. Bulkin

Chief, RCRA, Administrative Support Section
Permits Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date Prepared: July 13, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: PEPCO - Buzzard Point Generating Station

Location: First & V Street SW
Washington, D. C. 20068

EPA I.D. No.: DCD 00 081 9508

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. William A. Foy, Director, Environmental Affairs

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S02</u>	<u>4000 Gals.</u>
<u>T03</u>	<u>500 Gals./Hr.</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>F001</u>	<u>U210</u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # DCD 00 031 9503

January 14, 1981

Potomac Electric
Buzzard's Point Generating Station
1900 Pennsylvania Avenue, NW
Washington, D.C. 20063

Re: Acknowledgment of Application for
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

November 19, 1980

Mr. Jack Schramm
Regional Administrator
EPA Region III
P.O. Box 1480
Philadelphia, Pennsylvania 19107

Dear Mr. Schramm:

Potomac Electric Power Company (PEPCO) is pleased to submit the attached seven (7) applications for PEPCO Hazardous Waste Facilities. This application is submitted pursuant to EPA Regulation 41 CFR 122.23. You were previously notified on August 14, 1980, that PEPCO had or anticipated having the seven (7) Hazardous Waste Facilities identified. We have been informed by the Edison Electric Institute (EEI) and its Counsel, Wald, Harkrader & Ross, that EPA intends to submit further clarification of the May 19, 1980 regulation by regulation interpretation memorandum. However, without presently having these in time to submit this application, we would like to bring to your attention two aspects of the attached applications which might be significantly affected by your future regulation interpretation memorandum:

- (1) We understand that EPA intends to submit to the permit-by-rule process neutralization systems and, therefore, the applications in this submission may become unnecessary. However, to ensure that we maintain our interim status, PEPCO, today, identifies six (6) of the applications submitted, neutralization systems in RCRA Form 3, Part 4, Storage and Treatment for EPA Hazardous Waste #D002. When EPA produces this regulation, permitting these facilities by rule, the application here made for these components to the Hazardous Waste Facility, will become unnecessary.
- (2) PEPCO has identified quantities of spent solvents and commercial chemicals which are purchased, but are not necessarily generated as a waste at each of our facilities. While the small quantities of these wastes, which are finally produced from the hazardous chemicals used by these facilities, may be less than the quantity necessary to qualify for small volume exemptions, PEPCO is again attempting to retain our interim status by identifying these chemicals. The final disposition of these waste quantities would be determined when EPA completes its issuance of all regulation interpretation memorandum.

POTOMAC ELECTRIC POWER COMPANY

Mr. Jack Schramm

- 2 -

November 19, 1980

The application for the Hallowing Point Facility does not include the signature of the facility's owner. However, the operator's certification is submitted to you in a copy of the application and you should be receiving the owner's certification subsequently.

Should you disagree with my present interpretations for submission of this application, please feel free to contact me or Mr. James M. Hunter at (202) 331-6536.

Sincerely,


L. Stephen Guiland
Manager

LSG:jmm
Attachments (7)

cc: CF: RCRA Hazardous Waste Notification

V. FACILITY DRAWING (see page 4)

See Attachment

TABLE 1. CHARACTERIZATION OF SAMPLED WASTE STREAMS AT BUZZARD-POINT GENERATING STATION

SAMPLE CODE	SAMPLE DESCRIPTION	TESTED				RESULTS	
		YES	NO	SOLID	LIQUID	HAZARDOUS	NON-HAZARDOUS
B ₁	Dirty Water Sump for Units 1 and 2	X			X		X
B ₂	Dirty Water Sump for Units 3 and 4	X			X		X
B ₃	Dirty Water Sump for Units 5 and 6	X			X		X
B ₄	Neutralization Tank for Demineralizer Waste		X		X	X	
B ₅	Demineralizer Waste Sump		X		X	X	
	Boiler Cleaning Solutions		X			X	

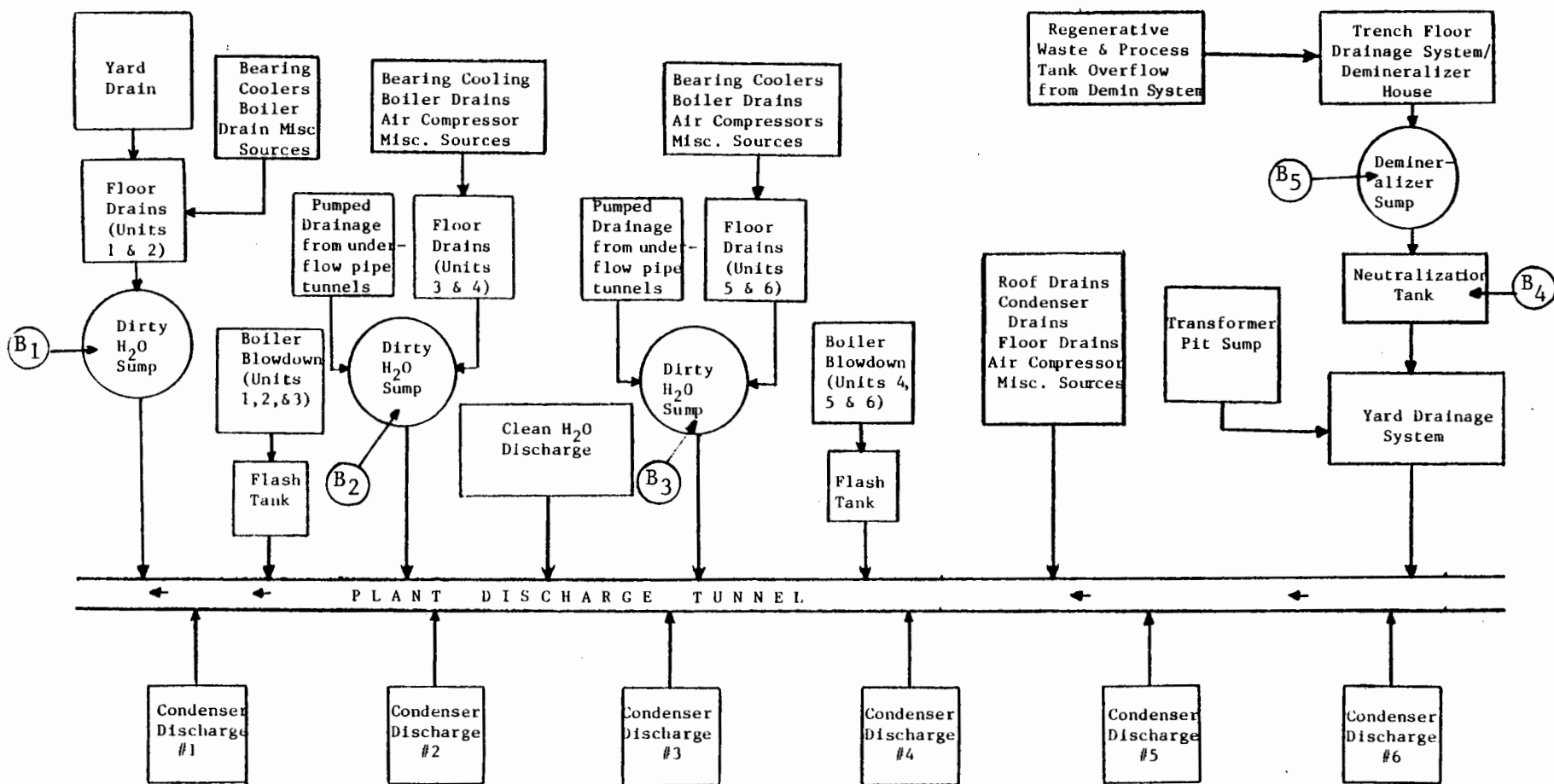


FIGURE 1. BUZZARD GENERATING STATION SUMP AND WASTEWATER FLOW DIAGRAM

August 8, 1980

Mr. Jack J. Schramm
Regional Administrator
Environmental Protection Agency Region III
P.O. Box 1480
Philadelphia, Pennsylvania 19107

Dear Mr. Schramm:

The Potomac Electric Power Company's (PEPCO) Buzzard Point generating station wishes to submit to the Environmental Protection Agency (EPA) the enclosed information in accordance with the notification requirements of Section 3010 of the Resource Conservation and Recovery Act (RCRA) completed in accordance with EPA Regulation 40 CFR 122.23(a)(1) of May 19, 1980. PEPCO is an investor-owned electric utility operating in the Washington metropolitan area. Specifically, the RCRA regulations require PEPCO to notify EPA by August 18, 1980 if any of its facilities generates, treats, stores, transports, or disposes of hazardous waste.

Because of its use of some chemical compounds in cleaning operations and in the production of high quality water for process operations, PEPCO recognizes that there exists a potential for the generation of hazardous waste. However, in determining whether or not PEPCO operates a treatment, storage, or disposal facility for potentially hazardous waste, PEPCO had to interpret EPA's meaning of a "totally enclosed treatment system."

PEPCO understands that the definition of a "totally enclosed treatment system" as provided in Section 260.10 of the said regulations may theoretically be interpreted to require PEPCO to provide notification on all sumps and tanks if they are not completely, physically enclosed. We understand, however, that it was not EPA's intent* to regulate such facility components (sumps and tanks) unless such a facility component

*EPA RCRA Interpretation: Wastes in Tanks or Vessels Not Subject to Rules, Inside EPA, August 1, 1980, p. 3.

POTOMAC ELECTRIC POWER COMPANY

produced a final sludge for disposal, posed a threat to human health or the environment, or the facility was a surface impoundment. PEPCO, therefore, decided to test all effluents and sludges in sumps, tanks, and ash ponds physically located outside of it's facility buildings for potential hazardousness.

Sumps and tanks within buildings were not tested since they were interpreted as totally enclosed by the building roofs. The only exception to this interpretation was to sample sumps from which sludges may be removed.

PEPCO has identified certain waste streams based on the above for which: (1) a chemical analysis was conducted to determine whether or not these streams fail the hazardous waste tests (i.e., corrosivity, reactivity, ignitability, or toxicity) as outlined in RCRA Subtitle C regulations; or (2) because of our knowledge of a particular waste stream, they were determined to be hazardous. Figure 1 describes the flow and source of these waste streams throughout the plants' waste collection and treatment system and Table 1 characterizes these streams and provides a key to the various sample points in Figure 1.

Waste streams from the demineralization process, as shown in Figure 1, were not chemically tested and were declared as potentially hazardous because of its corrosive character. The potential for hazardousness for these streams occur as a result of the cyclic nature in which demineralizer regenerative wastes are produced (i.e., an acidic stream is first produced and is followed by an alkaline waste stream). The waste streams from this process remain hazardous only for a short period (the alkaline waste stream is produced 90 minutes after the acidic stream) since both streams are mixed in a holding tank and neutralize each other, thereby, eliminating the hazardous condition for which it was declared. The results of all other waste streams identified and tested are provided in Table 1.

Should you disagree with the PEPCO interpretation of the requirements for notification or require further information, please feel free to contact James Hunter or me at (202) 331-6536.

Sincerely,



L. Stephen Guiland
Manager

LSG:jmm

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

RCRA SECTION
EPA REGION III

AUG 18 80 0000088

INSTALLATION'S EPA I.D. NUMBER
APPROVED
DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

POTOMAC ELECTRIC POWER COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

31900 PENNSYLVANIA AVENUE, NW

CITY OR TOWN

WASHINGTON

ST.

DC

ZIP CODE

20068

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

51st and V STREETS, SW

CITY OR TOWN

WASHINGTON

ST.

DC

ZIP CODE

20024

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 HUNTER JAMES, ENVIRONMENTAL ENG

PHONE NO. (area code & no.)

202-331-6536

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 POTOMAC ELECTRIC POWER COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U210	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)


☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) D. R. Briggs Vice-President, Production	DATE SIGNED
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